

EXHIBIT 207

STACEY E. PLASKETT Confidential
GOV. OF U.S. vs JPMORGAN CHASE BANK

May 09, 2023

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UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED
STATES OF AMERICA,

Plaintiff,

v

Case No. 1:22-cv-10904-UA

JPMORGAN CHASE BANK, N.A.,

Defendant,

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

STACEY E. PLASKETT

Tuesday, May 9, 2023

9:00 a.m. EST

Reported by: Goldy Gold, RPR

Job No. J9647388

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Q. What was your book going to be?

A. It was going to be a historical book about earlier life, maybe a generation or so ago, in the Virgin Islands.

Q. And what was the law firm that you worked for initially?

A. I worked with Nichols Newman Logan.

Q. And how long were you with Nichols Newman Logan?

A. I was there until 2007.

Q. Which was how -- I didn't ask you actually when you first moved down?

A. I think I moved down in 2005, so approximately two years.

Q. Okay. And what kind of work were you doing at Nichols Newman for those two years?

A. Primarily transactional. And also in the Virgin Islands at that time, all attorneys did court-appointed work. Most of the lawyers in the firm were not courtroom attorneys, and so I did a lot of the courtroom appearances for the law firm.

Q. Okay. And then 2007, you moved to a new job?

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A. Yes.

Q. What was that?

A. I was hired as the counsel for the
Virgin Islands Economic Development Authority.

(Court reporter clarification.)

BY MR. NEIMAN:

Q. What is the Virgin Islands Economic
Development Authority?

A. The Virgin Islands Economic
Development Authority is a semi-autonomous agency
in the Virgin Islands, which handles many
incentives to bring as well as grow businesses in
the territory through various vehicles: A
government development bank, which gives loans to
businesses, small businesses predominantly; a tax
incentive program under the U.S. code, which
allows businesses and individuals to receive tax
reductions on federal taxes for businesses and
employment that they bring to the territory.

Q. And you described this as a
semi-autonomous agency?

A. Correct.

Q. Can you explain what you meant by
that?

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2 you were going to run for Congress again? 11:04

3 A. When I lost. 11:04

4 Q. Okay. And when you went to work for 11:04
5 the Kellerhals firm, how long did you work there? 11:04

6 A. I don't recall the time frame, but 11:04
7 it would have been 2013. 11:04

8 Q. I know that in the past, at least, 11:04
9 Ms. Kellerhals had done work for Mr. Epstein 11:04
10 and/or his companies. 11:04

11 Did you, while you were at the firm, 11:04
12 do any work for Epstein or any Epstein-related 11:04
13 businesses? 11:04

14 A. I don't recall. 11:04

15 Q. What kind of work did you do at the 11:04
16 firm? 11:04

17 A. Predominantly transactional for 11:04
18 companies that were in the Virgin Islands and for 11:04
19 a few advice related to the economic development. 11:05

20 Q. And I take it that Epstein and his 11:05
21 businesses remained a client of the Kellerhals
22 firm during the time that you were there; is that 11:05
23 fair? 11:05

24 A. Yes. 11:05

25 Q. All right. Let's talk about a 11:05

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A. I don't recall.

Q. Did you talk to Mr. Epstein about
this press release?

A. I don't recall.

Q. Just going back to the press release
for a moment. I'm sorry.

You'll see in the third paragraph,
there's a description of you having received
\$5,400 in two separate contributions from Epstein
on August 2nd, according to federal campaign
finance records, right?

A. Yes.

Q. And that was true, right? You had
gotten two donations from Mr. Epstein personally
on or about August 2nd of 2016?

A. Yes, totaling \$5,400.

Q. Okay. And that was -- so August 2nd
was about two weeks after the text exchange with
Erika about what building you should be going to
for a meeting with Mr. Epstein, right? That's
Exhibit 20?

A. State the date again?

Q. I said it's about two weeks after --

A. Yes.

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A. Virgin Islands' politics, national politics, campaign contribution.

Q. Okay. Do you remember what your ask was?

A. No.

Q. Were you trying to raise money for the DCCC at this time?

A. I think I was always trying to raise money for the Democratic Congressional Campaign Committee.

Q. That's one of the jobs of being a Democratic congressperson, correct?

A. Yes.

Q. And you had a total of \$250,000 that you were supposed to try to raise?

A. Members of Congress, based upon their seniority and committee assignments, have dues as well as raise amounts that are requested.

Q. And do you recall yours being around \$250,000 in this time period?

A. I don't recall at that time period what it was, but that does not sound unreasonable.

Q. It does not sound unreasonable?

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A. No.

Q. Okay. And that's a lot of money?

A. Yes.

Q. So who were your prospects for raising that kind of money?

A. Individuals who had donated before, alumni, individuals who were interested in the same topics for which committees I sat on, other Democratic donors throughout the country, et cetera.

Q. Was Mr. Epstein on that list of people who would be a potential help in raising money for the DCCC?

A. Yes.

Q. Did you ask him to contribute to that?

A. Yes.

Q. Was that part of what was discussed at this meeting in September?

A. I don't recall if it's that specific, but it's possible, yes.

Q. Are there limits to the amount that any individual can donate to the DCCC?

A. Yes.

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2 Q. What are the limits? 02:18

3 A. At that time, I believed an 02:18
4 individual could give over 30,000. I can't 02:18
5 remember the exact amount, but it was in the 02:18
6 range of 30,000. 02:18

7 Q. How much did you ask Mr. Epstein to 02:18
8 give? 02:18

9 A. To the maximum, whatever that 02:18
10 maximum was. 02:19

11 Q. Okay. How do you get somebody to 02:19
12 give that much money? 02:19

13 A. You ask them. 02:19

14 Q. Okay. Did Mr. Epstein ever ask for 02:19
15 anything from you? 02:19

16 A. No. 02:19

17 MR. NEIMAN: Let me know mark now as 02:19
18 Plaskett Exhibit 40, a one-page text 02:19
19 exchange. 02:20

20 [Exhibit 40, September 2018 text 02:20
21 exchange, was marked for identification.] 02:20

22 BY MR. NEIMAN: 02:20

23 Q. All right. Ms. Plaskett, I've 02:20
24 handed you Exhibit 40, which is a text exchange 02:20
25 between you and Jerome, your chief of staff, in 02:20

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2 Jeffrey Epstein, right?

02:25

3 A. Yes. I believe I'm instructing
4 Jerome to send it to Erika and to let her know
5 about the conversation I had with him about it.

02:25

02:25

02:25

6 Q. With the idea that she would then
7 reach out to Mr. Epstein to arrange the
8 contribution?

02:25

02:25

02:25

9 A. Yes.

02:25

10 Q. And do you recall that the DCCC
11 rejected Mr. Epstein's contribution?

02:25

02:26

12 A. Yes.

02:26

13 Q. Tell me what you remember about
14 that.

02:26

02:26

15 A. To the best of my recollection, I
16 recall that I was informed by my chief of staff
17 that the DCCC informed him that Mr. Epstein's
18 contribution would not be accepted by the DCCC.

02:26

02:26

02:26

02:26

19 Q. What did you do when you heard that?

02:26

20 A. I'm not sure who -- if I can recall
21 who I reached out to at that point to inform.

02:26

02:26

22 Q. Okay. Did you do anything to try to
23 find out why the Democratic Congressional
24 Campaign Committee had rejected Mr. Epstein's
25 donation?

02:26

02:26

02:26

02:26

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A. I don't recall if it was already expressed to me in his letting me know that it was denied or if I got additional information. I don't recall.

Q. Do you recall what you learned was the reason why the DCCC would not accept Mr. Epstein's contribution?

A. Yes.

Q. What was that?

A. That he had not passed their vetting.

Q. What did you understand that to be a reference to?

A. I did not know the specifics of what that vetting was.

Q. Did you assume that it related to his status as a sex offender?

MR. ECKARD: Object to form.

THE WITNESS: I was not sure of the totality of the circumstances.

BY MR. NEIMAN:

Q. Did learning that the DCCC had declined to accept Mr. Epstein's contribution because he had not passed their vetting cause you

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2 record at 4:21.

04:22

3 BY MR. NEIMAN:

04:22

4 Q. All right. Congresswoman, this
5 won't take too much longer.

04:22

04:22

6 MR. NEIMAN: I'm going to hand you a
7 document that's marked as Plaskett
8 Exhibit 54.

04:22

04:22

04:22

9 [Exhibit 54, 2014 to 2020 donor
10 list, was marked for identification.]

04:22

04:22

11 MR. ECKARD: Counsel, this one
12 doesn't have a Bates number. Was it
13 produced?

04:22

04:22

04:22

14 MR. NEIMAN: Yes. This was produced
15 as a native.

04:22

04:22

16 BY MR. NEIMAN:

04:22

17 Q. So, Congresswoman, you were asked
18 some questions about the number of donors that
19 you have and the like by Mr. Ackerman, and I just
20 want to show you your actual list that you
21 produced of your donors, at least from the 2014
22 cycle through the 2020 cycle. Okay?

04:22

04:22

04:22

04:22

04:22

04:22

23 Do you see that?

04:23

24 A. Yes.

04:23

25 Q. And what we've done is we've

04:23

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highlighted the particular individuals on this list who are either Epstein or Epstein-affiliated persons who made contributions to your campaign in those cycles. Okay?

A. I'm looking through it.

Q. Yes. Let me know when you're ready.

A. Okay. Yes.

Q. And you can see on page 3 that Mr. Epstein appears as a donor, and that his lifetime total to your campaigns for the 2014 through 2020 campaign cycles was \$8,100 personally, correct?

A. I see that number, yes.

Q. And then if you look at the next page, you can see that Lesley Groff, who you corresponded with in connection with Mr. Epstein, also donated to your campaign?

A. Yes.

Q. And she donated 2,600. Do you see that?

A. Yes, I see that.

Q. And then if you look at the next page after that, you can see that Darren Indyke, who we saw was the person who presented on behalf

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of FTC, seeking a tax -- extension of tax breaks
from the development authority while you were
there, gave \$10,700 to your campaign.

Do you see that?

A. Yes.

Q. And that Mr. Kahn, who is also
associated with Mr. Epstein, gave \$10,700 to your
campaign as well.

Do you see that?

A. Okay. I see.

Q. And that Bella Klein, who is
described in this document as Darren Indyke's
administrative assistant, also donated \$2,600 to
your campaign?

A. I see that.

Q. So across those five people, there's
total donations in excess of \$30,000, correct?

A. I'm adding that up. That sounds
correct.

Q. Did you have any other contributor
who donated either directly themselves, or by
themselves, and with a group of people associated
with them, more than \$30,000?

MR. ACKERMAN: Objection to form.